

EXHIBIT A



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 31, 2020

BY EMAIL

Brian Heberlig
Steptoe & Johnson, LLP
133 Connecticut Avenue, NW
Washington, D.C. 20036
(202) 429-8134
bheberlig@steptoe.com

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (AJN)

Dear Mr. Heberlig:

We write concerning the audio recording made by Canadian law enforcement of Bahram Karimi's January 22, 2020 interview (the "Recording"). Specifically, we disclose that we learned for the first time yesterday that (1) the FBI's Legal Attaché in Canada received the Recording from the Canadian government on February 4, 2020, (2) that FBI New York was informed that the Legal Attaché had the Recording on February 6, 2020, and (3) that FBI New York received the Recording on February 12, 2020. Due to a miscommunication, FBI New York did not inform the AUSAs that they had received the recording until March 30, 2020.

As you will recall, on February 5, 2020, the Government produced all interview notes and reports associated with Bahram Karimi, including seven pages of notes from the January 22, 2020 interview.¹ Prior to this production, the case agents from FBI New York informed the AUSAs by email that they had not yet received the Recording from the Canadian government. On February 18, 2020, one of the case agents mistakenly indicated, in response to an inquiry from one of the undersigned AUSAs, that the recording was "in transit." On March 30, 2020, following another inquiry, the case agents informed the undersigned that the FBI New York in fact had received the Recording on February 12, 2020.

Last night, we received the Recording from the FBI. We are working on a response to all other aspects of your letter dated March 24, 2020, but wanted to provide you with the Recording

¹ On January 30, 2020, the Government publicly indicted Bahram Karimi. Count Three of the indictment charged Karimi, under Title 18, United States Code, Section 1001, with making the following false statement: "during the course of the Venezuela Project, KARIMI believed that international sanctions against Iran did not apply to Iranian companies or persons."

beforehand. Please let us know if you want us to send the Recording by CD or to upload it to the shared website, as it is too large to send by email.

Respectfully submitted,
GEOFFREY S. BERMAN
United States Attorney

By: _____ /s/
Michael Krouse / Jane Kim / Stephanie Lake
Assistant United States Attorneys
Garrett Lynch
Special Assistant United States Attorney
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